

**WIN/INFORMED**

**UNIVERSE IDENTIFICATION AND  
WASTE ACTIVITY MONITORING  
(UID/WAM)**

**SITE VERIFICATION  
IMPLEMENTATION GUIDE**

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# INTRODUCTION

## Purpose and Audience

This document is being distributed to all State environmental agencies and EPA to present the results from one of the recommendations of the WIN/INFORMED initiative. This document should be of interest to both program managers and data administrators. It will provide insights into some of the policy changes that are occurring as well as the likely implications to RCRAInfo and equivalent State information systems.

This document is intended to help RCRA Implementers develop (or improve upon their existing) verification process so that the quality of their Site Identification data meets the goals set by the State-EPA WIN/INFORMED initiative. Although a number of RCRA Implementers have already achieved these goals, the majority has not, and of those, many have already indicated their desire to improve their situation. This section is intended to provide guidance regarding how verification can be achieved based on the experiences of those that already have implemented some verification mechanism.

## Background

As part of the WIN/INFORMED initiative, analysis of the Universe Identification (UID) and Waste Activity Monitoring (WAM) program areas was completed in January 2000. The analysis described a number of recommendations for changes to the current RCRA program information management practices, and provided high-level plan to guide the design and implementation of these recommendations.

*You can find a copy of the report that describes the results of this effort, published on the Internet at: [www.epa.gov/epaoswer/hazwaste/data/win/r00-004.pdf](http://www.epa.gov/epaoswer/hazwaste/data/win/r00-004.pdf)*

*Please note that the PAA Report should be used for reference when reading this document. This document has specifically avoided duplicating the results contained within the PAA document. Much of the background regarding the intent and reasoning behind recommendations referenced in this document can only be found within the PAA Report.*

One of the key PAA recommendations; “*Recommendation 2: Study the feasibility of periodic site verification*”, is concerned with improvement of the quality of basic site information held by the RCRA program through regular verification of basic RCRA Site information<sup>1</sup>. During 2000, a study was undertaken to consider the alternative mechanisms by which identification data might be verified by RCRA Sites. This study attempted to estimate the cost and burden imposed upon the regulated community and RCRA Implementers.

The study findings and recommendations were subject to national review by all States, Territories, EPA Regional Offices and the EPA Office of Solid Waste and Office of Enforcement

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<sup>1</sup> In summary, this recommendation states that States and EPA need to get more up-to-date basic identification information about the RCRA Sites that they regulate (i.e., their business name, address, contact person, and types of RCRA regulated activities). To achieve this, RCRA Sites should periodically review the identification information that each Implementer knows about the Site and identify any changes that have occurred to that information.

and Compliance Assurance. Following this national review, the WIN/INFORMED Coordinating Committee and Executive Steering Committee agreed that the recommendation should be considered further during the Program System Analysis (PSA) phase when the implications of the recommendation would be further evaluated and implementation mechanisms designed.

The goal of the Program System Analysis (PSA) phase was to clearly define the implementation mechanism(s) for the recommendation. Outreach tasks were also conducted to communicate the benefits of the recommendation to States and to the regulated community and to obtain a greater understanding of the costs and benefits associated with its implementation. The outreach tasks were also used to identify barriers to implementation along with an understanding of how to minimize those barriers and maximize benefits for States and the industry.

## **Document Organization**

The remainder of the Implementation Guide is organized into the following sections:

### **Verification Overview**

Provides an overview of the issues and needs for keeping Site Identification information up to date, along with the benefits that have been identified nationally.

### **Implementation Principles**

Specifies the agreed upon goals for ensuring a consistent minimum level of data quality nationally, and the flexibility required for RCRA Implementers to support these goals.

### **Alternative Verification Approaches**

Presents a number of different scenarios in which Site Identification data can be verified, based on both the experiences of State and Regions that are currently performing this process, as well as new and upcoming opportunities made possible through the use of the Internet.

### **Appendix: Results Of Outreach To Implementers And Regulated Community**

Summarizes the responses received from States, Regions and the regulated community during an exercise to determine their support and gain their input upon how Site Verification should be implemented.

### **Appendix: Case Studies Of State Verification Processes**

Provides some information about how a set of States is currently performing Site Verification, and the results they have found.

### **Appendix: Example Site Verification Form**

Presents an example reporting form that demonstrates the types of information that should be verified, along with a format similar to that used by a number of Implementers.\

# VERIFICATION OVERVIEW

## Process Summary

To have a meaningful picture of the regulated universe, Implementers must be able to distinguish which Sites have ongoing RCRA Activities. This information supports various EPA and State program activities.

The notification process is the initial means for identifying hazardous waste sites under the RCRA program. Once a RCRA Site submits a Site Identification Form, there is no Federal regulation requiring the RCRA Site to inform the Implementer of any changes to the reported information<sup>2</sup>. For example, if the RCRA Site's generator status changes from large quantity to small quantity or it is no longer handling hazardous waste or changes the types of waste being generated, the Implementer is not always notified. When RCRA Sites cease operation, or stop generating hazardous waste, they can be considered inactive for that type of activity. Given this lack of regular update, the site information available to the RCRA program can quickly become outdated and inaccurate.

When reviewing all of the national data, most of this information was only collected once (via an initial Notification Form) and is many years old. Many States and Regions have already implemented varying forms of verification processes and have already achieved an excellent level of data quality. However, others do not perform any form of verification, and the data about many of their RCRA Sites is likely to be out of date.

It is very important for the state and federal environmental agencies to have accurate information about which companies are generating, transporting and/or managing hazardous waste so that they can ensure that this is being performed safely and correctly. This information is also shared with the public (increasingly more easily via the Internet) who expect the information to represent the current situation.

To improve the quality of RCRA Site information in national and State systems, Implementing States and EPA Regions are being encouraged to conduct some type of verification process on a regular basis. Where possible, Implementers should attempt to conduct this verification process at a minimum for all active TSDFs, LQGs, SQGs, and transporters that have previously notified and which have a valid EPA identification number. Response by the RCRA Site would be voluntary unless otherwise required by State regulations.

This verification process should, where possible, include the following nationally required information needs. These represent most of the information that is currently collected on the new federal Site Identification form<sup>3</sup>.

- EPA identification number
- Site name
- Location address

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<sup>2</sup> with the exception of LQGs and TSDFs which have a federal biennial reporting requirement, and for some additional instances for TSDFs.

<sup>3</sup> If you would like to learn more about the new Site Identification form, please review the information that is available at the following web site:

[www.epa.gov/epaoswer/hazwaste/data/brs01/forms.htm](http://www.epa.gov/epaoswer/hazwaste/data/brs01/forms.htm)

- Land owner type
- Owner name and type
- Operator name and type
- Site contact name, number and e-mail address
- Mailing address
- Industry types
- Regulated Waste Activities (e.g., generator status)

Although the current biennial Hazardous Waste Reporting process does require that most of this information is 'refreshed' every two years, this process only covers a sub-set of the RCRA Sites. A number of State environmental agencies have already taken steps to resolve this issue by either requiring through regulation, or optionally requesting that all regulated Sites inform the agency of any updates to the information on record at the agency. Most of these agencies have relied on one of two methods, either requiring a RCRA Site to fill out a new form whenever a change occurs to that information, or by periodically sending a pre-printed, filled out form so that the RCRA Site can just document any changes required and return it. In many cases, these RCRA Sites have commented that they find the process very straightforward and easy to support.

## **Expected Benefits**

Implementation of this recommendation will provide Implementers and EPA with significant improvements in the overall quality of the information about the universe of RCRA Sites that they regulate. Some of the benefits that may be expected from this improvement in information quality are:

- More accurate resource allocation and planning for States, EPA Regions and EPA Headquarters.
- More accurate planning and targeting for State and EPA inspections and technical assistance visits.
- Will provide more accurate and supportable information to respond to public information requests, resulting in increased public confidence in the information.
- Will enable more accurate regulatory impact analysis.
- More accurate environmental justice analysis.
- Better targeting for waste minimization activities.
- Will provide better data to support the assessment of program effectiveness.
- Critical information for State fee collection mechanisms.
- Able to provide high quality, up to date information to local government agencies to support their regulatory responsibilities.
- Potential reduction in costs associated with returns of agency mailings to the regulated community, for example, of Hazardous Waste Report forms, regulatory bulletins and so on.
- Reduction in costs associated with reduced resources required to conduct site visits by inspectors and technical assistance staff.



## IMPLEMENTATION PRINCIPLES

During the development of the recommendation for RCRA Site verification, the PSA Team and national reviewers identified a number of basic criteria that must be part of an effective implementation.

**Data collected and managed by RCRA Implementers for the ‘nationally’ required Site Identification information needs should comply with, or exceed a specific level of data quality.**

The following national information needs should be included within any verification mechanism:

- EPA identification number
- Site name
- Location address
- Land owner type
- Owner name and type
- Operator name and type
- Site contact name and phone number
- Mailing address
- Industry types
- Regulated Waste Activities (e.g., generator status)

**The verification process should ensure that this information is never more than two years old for TSDFs and LQGs, and five years for SQGs and Transporters.**

These data quality goals were agreed by the WIN/INFORMED States and EPA to provide the best return in terms of improved information quality with limited burden increase. However, national reviewers also stressed that each Implementer must have the ability to conduct the process more frequently if desired. The Implementer will determine the best frequency for this process taking into account their resource and other constraints and other reporting requirements.

**Implementers and the regulated community will not be required to implement or respond to the verification requirement.**

Although Implementers will be encouraged to conduct the verification process and RCRA Sites will be encouraged to respond, there is not enough current support for a federal regulation and so this process must remain optional. Individual States may elect to mandate the verification requirement if desired and the Implementer may take appropriate follow-up actions at their discretion.

**Implementers must be allowed to apply the core principles of the recommendation using the most appropriate approach.**

While this recommendation has resulted in a number of preferred options for the implementation of verification, the practical application of the recommendation by each Implementer must be allowed to vary according to the Implementer’s specific needs.

## ALTERNATIVE VERIFICATION APPROACHES

This section describes multiple ways that verification can occur, along with the data management considerations and a summary of the new system components that would be required to support this process.

These alternatives are not mutually exclusive. An Implementer could use a combination of these approaches. For example, inspections could be used to verify the data, and for any sites that had not been verified with the required time frame (e.g., 5 years for SQGs), a pre-printed verification form could be sent out.

### Data Collection Processes

This section outlines a number of alternative scenarios for the implementation of elements of the verification recommendation. For each option, a description of the basic design is provided followed by a discussion of the pros and cons of the option.

These options provide a variety of ways that verification can occur. It is anticipated that Implementers and RCRA Sites may wish to employ more than one of these options so that they get the greatest level of coverage and frequency.

A number of the options include the use of a form that has been pre-printed with the RCRA Site's data included, thus allowing the RCRA Site to note any changes that had occurred since the data was previously collected. This is an approach that has already been proven by multiple States and Regions to reduce the burden for both Implementers and reporters. (Note: EPA intends to provide a report that will produce these pre-printed forms as described in the 'Information System Enhancements' section below).

The reader should refer to the last Appendix that provides an example form that could be used to perform a verification exercise. The form is an almost exact replica of the new Site Identification form and demonstrates the types of information that would be verified and updated where necessary. By duplicating the format of the Site Identification form, the same instructions booklet can be used to guide the respondent, although it is recommended that a shortened version be used to encourage greater response when the response is voluntary.

The major difference with the form attached here is that for each 'field' on the form, there is space for the current data (pre-populated) and for amended data (to be filled in only if the current data needs to be updated). On the third page, the tick boxes are duplicated (separated by an arrow), and would indicate the current (left) and amended (right) data. Note that the attached form is only intended to provide the reader with a demonstration of what the form might look like. For example, the final form might be better formatted with the populated data content and enterable fields (for any changes) split between the left and right hand sides of the page. Also, some implementers believe that the responses are more reliable if the 'regulated activity' information (question 10 on the form) is completed anew each time, instead of including the current data on the form.

Although this form represents a paper-based approach, one can imagine an equivalent version that could also allow for some of the more automated verification processes (e.g., web based data entry).

## ***General Data Collection Suggestions***

The following suggestions are made based on the experience of Implementers and the input received from the regulated community.

### ***Identifying RCRA Sites to Verify***

Given that any form of verification incurs some burden, Implementers may want to target a selection of RCRA Sites to verify. This approach can be used either to allow for discrete, manageable sets of RCRA Sites to be verified (instead of infrequent mass efforts), as well as focusing the effort on RCRA Sites that have not been contacted for the longest time. A number of methods can be used to help target sites, a few that have been proven to work well by Implementers are:

- Target a sub-universe based on criteria such as type (i.e., generator status, transporters, TSDFs), county, and age of the data contained about them.
- Exclude RCRA Sites that have reported as being no longer ‘active’, particularly if subsequently confirmed by an inspection.
- If available, use manifest data to identify RCRA Site’s that either:
  - appear not to be generating hazardous waste anymore (or vice versa), or
  - have modified their mailing address.

### ***Verification Request Letter***

For those RCRA Implementers that will be requesting this information from RCRA Sites on a voluntary basis, it is very important to provide them with a succinct explanation of why they are being asked to verify their information. By expressing the most significant benefits that the Implementer will gain, it is anticipated that the response rate will increase. Additionally, if there is any way that the Implementer can provide some incentive for the RCRA Site to respond that would certainly help. Many of the current Implementers that verify, tie the process in with a fee collection process, which clearly ensures a much greater response rate.

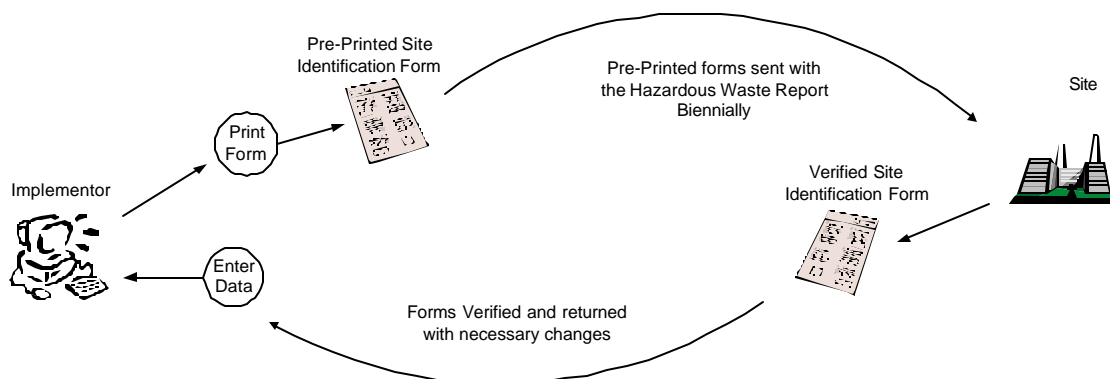
### ***Non-respondents***

When using a voluntary process it is hard to discern whether a lack of a response is due to the RCRA Site being no longer active, or due to their election not to respond. However, if adequate resources are available the following types of steps may be taken:

- Call the RCRA Site directly, ideally to persuade them to respond, but at least to ascertain whether they are still in business.
- Prioritize such sites for upcoming inspections.
- Review ancillary sources of information to determine whether they are no longer active (e.g., State business license register, web research).
- Contact a TSD known to have received waste from the RCRA Site in the past to determine whether they are still active.

***Scenario 1: Include pre-populated Site Identification forms with the Hazardous Waste Report forms packets mailed biennially to each RCRA Site.***

Among those States who currently conduct some form of regular verification, the preferred mechanism employs pre-printed forms containing the latest information that the Implementer has for the RCRA Site.



This scenario would couple the use of these pre-printed forms with the biennial submission of the *Hazardous Waste Report* by LQs and TSDFs. A *Site Identification* form would be prepared for each RCRA Site, including the current data about that RCRA Site available to the Implementer. This may be derived from the national RCRAInfo system or the Implementers own system if they have one. Where the national or Implementer systems include historical data, the latest information from any source will be used to populate the form.

*Hazardous Waste Report* forms packets would then be prepared for each RCRA Site, including the relevant *Site Identification* form and would be mailed to the RCRA Site. The RCRA Site would then annotate the pre-populated form to correct any changes or errors and would complete the additional forms concerned with waste generation and management information before signing the report to authorize the information contained and submitting the complete packet to the Implementer.

Implementers would be able to apply the changes to site information indicated by the RCRA Site to either their own or the national information systems. The Implementer may customize the *Site Identification* form and therefore the data that is pre-populated where they use their own systems that have differing data requirements to the national system. In such cases, however, the Implementer must still provide the national information needs to the national information system.

The approach would be driven largely by the Implementer's waste reporting requirements and would be dependent on the use of known information. Verification would be considered optional since the RCRA Site may choose not to update the *Site Identification* form. By coupling the process with the *Hazardous Waste Report* submission, the Implementer will ensure that the process is conducted at least biennially and potentially more frequently in those States that have annual or quarterly waste reporting. The universe targeted would, however, be limited to only LQs and TSDFs. Electronic reporting mechanisms would not be a part of this scenario.

When assessing implementation costs it is important to note that mailing of the *Hazardous Waste Report* forms would become more complex since each mailing would need to be customized to the specific RCRA Site, to include the correct pre-populated form information.

Many RCRA Sites and Implementers now use third-party reporting software to submit biennial *Hazardous Waste Report* forms, rather than paper-based reporting. This scenario would not have any impact in these cases but may be combined with the next scenario.

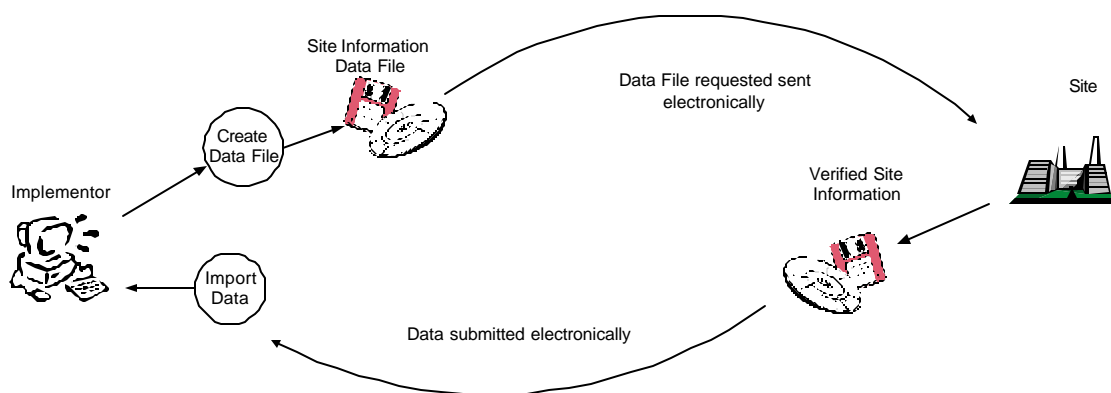
Note: this scenario does not need to be performed in conjunction with waste reporting. For SQGs and Transporters, pre-populated forms could be sent to them at any time, along with a request letter asking them to make their corrections and return it.

***Scenario 2: Include pre-populated Site Identification information in third party Hazardous Waste Reporting software customized and delivered to each RCRA Site.***

This scenario essentially applies the basic principles of the previous scenario to those situations where RCRA Sites complete their *Hazardous Waste Report* form submissions using third-party reporting software, such as Turbowaste, EMCI's, or Florida's BR Disk.

In this case, the third-party software would be customized to the specific RCRA Site such that known site information is pre-populated into the software and made available through the portion of the software that collects site identification data such that the data may simply be updated. The importing of this data could be achieved via the internet. The software could initiate a request (based on an EPA ID number) to an Implementer or EPA web site that would automatically produce a file for download containing that RCRA Site's most recent identification data.

It is worth noting that for RCRA Site's that continue to use the same software as for previous Hazardous Waste Reports, they may have the ability to update that data instead of re-entering it, and this may be their preference.



Once data is entered in to the third-party software, the resulting reports may either be printed or in some cases, transmitted electronically to the relevant Implementer. When printed, the forms will be signed to provide authority for the changes. Where the data is to be transmitted electronically, some form of security certificate would be included in the third-party software to identify the RCRA Site and authorize the information provided.

Again, Implementers would be able to apply the changes to site information indicated by the RCRA Site through the reporting software to either their own or the national information systems.

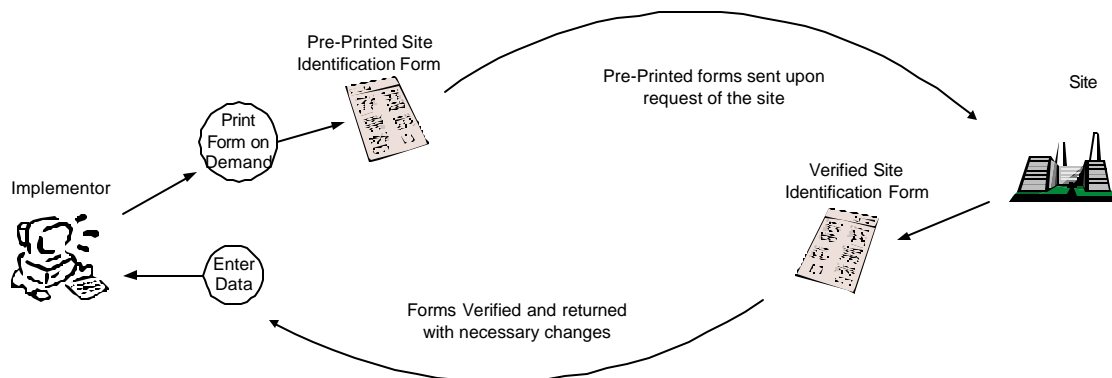
Verification would again be considered optional since the RCRA Site may choose not to use the reporting software for its submissions. By coupling the process with the *Hazardous Waste Report* submission, the Implementer will ensure that the process is conducted at least biennially, although, again, the universe targeted would be limited to only LQs and TSDFs. Use of this scenario would incorporate the electronic reporting opportunities that may already be included in the third-party software products.

When assessing implementation costs it is important to note that customization of the third-party reporting software to each specific RCRA Site, and to potentially include security certificates, may present significant additional technical challenges. However, this scenario has been included because there is at least one existing state (Texas) that is currently providing sets of this data electronically for each RCRA Site. EPA's Central Data Exchange initiative should provide the infrastructure necessary to support legally binding, fully-automated electronic reporting.

### ***Scenario 3: Provide “on-demand” capability to allow RCRA Sites to request pre-populated Site Identification forms.***

This scenario would allow a RCRA Site to call into an automated phone system to request that a *Site Identification* form be sent to them. The RCRA Site would identify itself using its EPA identification number and would request either that a form be mailed or faxed. For the latter, the caller would then provide fax number information. This system could be set up at the national level, managed by EPA, or by each Implementer using their own RCRA system.

Once a request is received the Implementer's or EPA's system would produce the form, pre-populated with the latest information about the RCRA Site and would direct the form to either the mailing address or fax number provided.



The RCRA Site would annotate the pre-populated form to correct any changes or errors before authorizing and submitting the completed form to the Implementer. The Implementer would be able to apply the changes to site information indicated by the RCRA Site to either their own or the national information systems

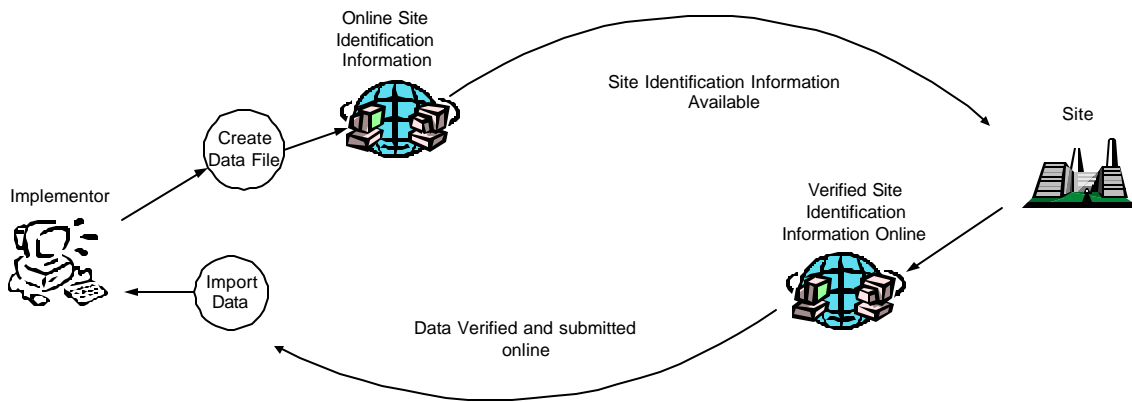
This scenario allows the Implementer to develop the specific details and meets the requirement of optionality. Once again, the latest known information about the RCRA Site is used to expedite the response. However, this scenario would not ensure verification from either the desired universe or at the desired frequency, without active Implementer outreach and “marketing”.

***Scenario 4: Provide pre-populated Site Identification forms online for printing and manual submission by RCRA Sites.***

This scenario relies on making site identification data held in national and potentially, Implementer-specific systems, available online. The RCRA Site would be able to produce a *Site Identification* form online, which would be pre-populated with the latest information available in either the national or Implementer systems.

The functionality to produce this report could be provided on either the EPA RCRAInfo Web site or on the Implementer's Web site. Security should not be an issue, given that the information contained on the form is not confidential.

The RCRA Site would then print the report, amend or add to the details as necessary and would then sign the report to authorize the information. Implementers would be able to apply the changes to site information indicated by the RCRA Site to either their own or the national information systems.



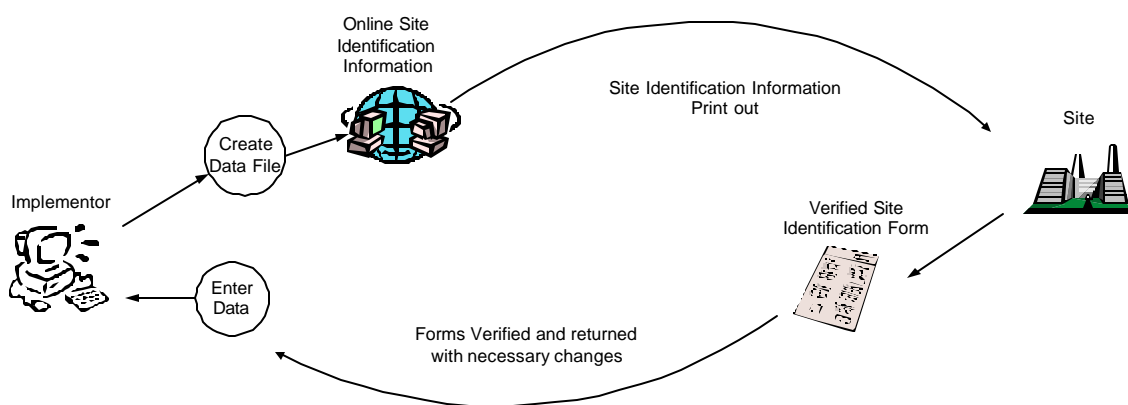
This scenario allows the Implementer to develop the specific details and meets the requirement of optionality. Once again, the latest known information about the RCRA Site is used to expedite the response. However, this scenario would not ensure verification from either the desired universe or at the desired frequency, without active Implementer outreach and “marketing”.

Development of the necessary Web-based reporting mechanism would likely be relatively simple and similar mechanisms are already available at existing Implementer and EPA Web sites. Once this scenario is in place, it would require only minimal support from Implementers, thereby reducing the burden on that group.

### ***Scenario 5: Provide pre-populated Site Identification forms online for correction and submission online by RCRA Sites.***

This scenario is essentially the same as the previous scenario in that site identification data held in national and potentially, Implementer-specific systems, would be made available online to RCRA Sites. The RCRA Site would be able to produce a pre-populated *Site Identification* form online. However, instead of manually applying changes to a printed copy before submitting the authorized changes to the Implementer, functionality would be provided through the relevant Implementer or EPA Web site to enable the RCRA Site to amend the site information online and to submit those amendments electronically.

Appropriate security certificate or electronic signature mechanisms would be put in place to ensure that only the appropriate individuals were able to change the details for the RCRA Site.



The submitted changes would not be automatically applied to the Implementer or national data sets until reviewed and quality assured by the Implementer.

This scenario allows the Implementer to develop the specific details and meets the requirement of optionality. Once again, the latest known information about the RCRA Site is used to expedite the response. However, this scenario would not ensure verification from either the desired universe or at the desired frequency, without active Implementer outreach and “marketing”.

Development of the necessary Web-based reporting mechanism would be more complex than the previous scenario, simply because of the need for secure data submission. However, once in place this scenario would require only quality assurance support from Implementers.

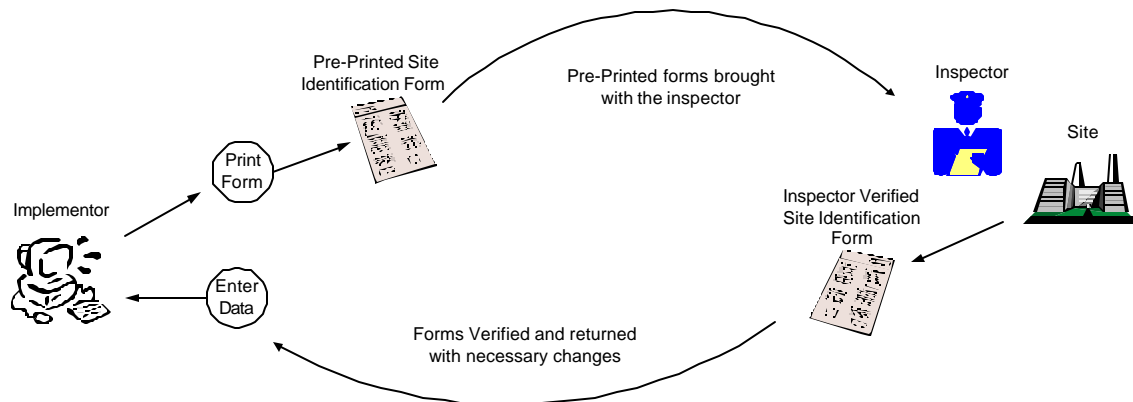
Development of the appropriate security certificate or electronic signature mechanisms should incorporate standards developed for the electronic submission of other environmental regulatory compliance data, for example, those developed in support of the Central Receiving initiative. This might be achieved simply by securing the submission of changes to a RCRA Site-specific password.



***Scenario 6: Provide data capture mechanism for use by inspectors.***

This scenario differs from the previous alternatives in that the burden for recording the changes to the site identification information for the RCRA Site would be assumed by an inspector representing either the Implementer or the EPA.

This scenario calls for the inspector to be provided with a pre-populated form in either electronic or paper media prior to visiting a RCRA Site. The form would be populated using the latest data available in the Implementer-specific or national systems. During the course of the visit, the inspector would record any changes to the site information that are identified on either the paper form or electronic record. Following the inspection the Implementer would apply any changes to the Implementer-specific and national systems. Alternatively, the inspector could assist the site



representative in filling out the form allowing the Site to sign the form at that time for formal submission to the agency.

This scenario could be applied at the Implementer's discretion. The frequency and universe targeted would depend on the inspection practices employed by the Implementer, and if performed frequently enough for the entire universe(s) of Sites could alone be sufficient to meet the criteria of the recommendation.

***Scenario 7: Require any changes to Site Identification data to be reported***

This scenario differs from the previous alternatives in that it requires a State regulation to be implemented. This regulation would require regulated Sites to inform the State agency of any changes that have occurred to their Site Identification data. A number of States are already using this approach and specify a duration (e.g., 90 days) in which the updated information must be provided to the agency. Typically, these States have required that blank forms be filled out anew, along with the corrections incorporated.



Clearly this scenario could be used in conjunction with Scenario 3 above, which would allow a RCRA Site to request, or print from the web, a version of their personalized Site Identification form. By providing this alternative to blank forms, the burden of responding may be reduced for both parties.

The likely success of this scenario if implemented on a voluntary basis is unknown, but probably not good given that many RCRA Sites may forget about notifying the agency if it were only optional that they do.

## Information System Enhancements

Assuming that any of the above options may be implemented, RCRAInfo and some State systems will need to be enhanced to accommodate these changes. EPA is intending to implement the necessary capabilities in phases as soon as is practical. The following is a list of the automated changes prescribed by the scenarios, and a reference to the scenario requiring the change.

### *Verification Report*

#### *References Scenario 1, 3 & 6*

This would be a highly formatted report that would look similar to the example provided in the last Appendix. The data for the Site Identification fields will be obtained from the RCRAInfo database's Handler module (based on the Implementer-specific integration of the BRS data into the Handler module in the near future).

This report will be usable for mailing to the RCRA Site as well as for a fax back option, and the online version of the form that would be available for printing (e.g., from Envirofacts).

This report would allow the Implementer to specify which RCRA Sites the 'report' should encompass. Although the report would be able to produce a single form (based on an EPA ID number), this capability would also allow the Implementer to produce multiple pre-populated verification forms for the universe of RCRA Sites they wish. The types of parameters would include:

- Type of regulated activity (e.g., LQGs, SQGs, Transporters, TSDs, etc.)
- Location state
- RCRA Sites that have not verified their data in the last two or five years

These parameters could be used in conjunction (e.g., all TSDs and/or LQGs in my State), and the order they are printed should also be Implementer defined (e.g., order them by the mailing city to aid in the mail out).

Ideally, the report could also be accompanied by a mailing label report that would contain mailing labels ordered identically to the verification reports. This would ease the mailing distribution process if a mass mailing were intended. This report should allow the Implementer to download it electronically so that it can be imported into software that would print the labels in the Implementers desired format, or mail merged with a customized request letter.

Some States that have implemented this have found it convenient to add bar code to the form that identifies the EPA ID number. This can be useful if a high volume of forms is received and a registry of those forms is convenient to manage the data entry process over multiple weeks.

### *Web Data Entry*

#### *References Scenario 5*

One possible solution to Site Verification is creating a web application that allows for data entry. There is certain functionality that needs to be developed to allow for updates to the database.

The approach used to allow for legally supportable submissions of data to agencies is still being developed. Furthermore, the implementing agency would determine whether they would employ their own requirements and receive the data submissions directly, or alternatively rely on EPA's

federal electronic reporting mechanisms and require their RCRA Site's to use RCRAInfo's web data entry directly.

Although EPA's Central Data Exchange (CDX) approach to environmental reporting has not yet been finalized, the following is an example scenario to demonstrate the type of process that may be used to support electronic reporting. The system would require an Implementer to register and receive a user id and password, and setup a Trading Partner Agreement (TPA). The TPA is a document outlining the rules and regulations that must be followed between the two parties. The TPA is also signed in 'wet ink' and documented to ensure that their subsequent electronic data submissions were legally binding.

While some sites may find this type of registration process cumbersome, they may be encouraged given that they could also use this approach for other forms of electronic data interchange with EPA in the future.

### ***Web Download***

#### ***References Scenario 2***

Another option would allow for the RCRA Sites to go online to a RCRAInfo (or Implementer's system) web site and download their site identification data (e.g., in XML format). This dataset would be imported into their software packages and allow them to update it directly prior to submission back to the agency. The format in which it is returned may be similar to the format each Implementer is currently using for electronic Hazardous Waste Report data submissions. Alternatively, the approach described below for 'electronic receipt' may be employed.

### ***Electronic Receipt***

#### ***References Scenario 1-4***

This functionality is mainly geared for the individual sites with their communication between the States and/or the EPA. Upon logging in to the CDX, the data can be uploaded in the format of an eXtensible Markup Language (XML) document. This is a very common approach to data transactions over the Internet. The login information and verification process with TPAs is going to be the same as it is for the, above-mentioned, Web Online update. This would allow sites to electronically send their RCRA Site Identification Verification information to the EPA via CDX. As with the Web Data Entry functionality, this would require the need for authentication and verification from each site.

## **APPENDIX: RESULTS OF OUTREACH TO IMPLEMENTERS AND REGULATED COMMUNITY**

### **Site Verification Outreach – Industry Respondents**

Outreach was performed with industry representatives to gain their feedback regarding the proposal to perform a voluntary Site Verification process. This was accomplished by targeting two audiences.

A few RCRA Sites were identified and interviewed. These RCRA Sites were representative of both the larger and smaller generators, both those that had participated in a verification process in the past, and those that had not.

A selection of Trade Associations was targeted, of which four responded representing chemical manufacturers, electroplaters, service stations, and automobile dealers. The associations selected were chosen because they represent the majority of companies that would be most significantly impacted by this proposal.

A summary of the responses to pertinent questions is included below.

***Do you feel that [you / your members] would gain any benefits by ensuring that the government accurately maintains identification data about their site? If so, what benefits would be most significant?***

Generally, the respondents did not consider site verification as a great benefit to the RCRA Sites. Although there are some advantages these appear to only apply to a sub-set of all RCRA Sites. For example, sites that have reduced / eliminated their regulated activity would benefit because other companies (e.g., insurance companies) would not be wrongly biased against them due to their prior regulated activities appearing to be ongoing.

***Do you anticipate that [you/ your members] would respond to such requests from an environmental agency if their response were entirely optional?***

Although a half of the trade associations believed their members would not respond, the others, including most of the RCRA Sites said that they probably would.

***Which of the following approaches do you think would be most successful?***

- ***Receive form, fill out, sign and send***
- ***Receive request, go to web, fill out, print and send***
- ***Receive request, go to web, fill out, submit with ‘electronic signature’***

Multiple options seem to be the consensus, with paper being the default and most commonly acceptable.

***Would you support or discourage a federal regulatory requirement for this verification process?***

No trade association would support this. Although a few did identify some benefits for their members, it is hard to know whether they would discourage a federal regulation because they do not feel that the benefits are great enough, or because a voluntary approach was presented as an alternative. Regardless, it is likely that the majority of associations would not support a regulation.

## Site Verification Outreach – RCRA Implementers

Responses were received from a combination of Regions and States that together represented 39 out of the 54 States and Territories included within the survey distribution. The results from this outreach are described within the two sections below. The first section provides a summarization of the responses for those questions that required relatively specific answers. The subsequent section provides the full text of responses received for the more open questions posed within the survey and the general comments received.

***Have you already attempted any form of verification process, and if so of which type?***

- A. Pre-printed paper forms***
- B. State regulatory requirement to re-notify if information has changed***
- C. Provide software and a personalized data set for electronic response***
- D. Other – please specify below.***

Approximately one third of respondents do not perform any exercise similar to A, B or C above, but solely rely on inspections, biennial reports and voluntary re-notifications. Of the remainder that do perform some type of similar exercise, they are generally split between those that have a regulation in place, and those that use pre-populated forms. A few of the latter actually use blank forms, but with the same intent. Many of these practices do not include the full universe identified as part of the recommendation.

***Currently, the nation's RCRAInfo Site Identification data is on average 9 years old – what do you feel is an adequate average age for this type of data?***

The average response was approximately 2.5 years. The most common response was 2 years old.

***Is there some site identification data that you feel is in greater need of update than the rest, either due to importance or volatility ? If so, indicate which data is most important to keep up to date.***

Of the 35 respondents to this question, the following were identified as being of greater need than the rest:

Site Name	60%
Site Location	40%
Site Contact	40%
Mailing Address	54%
Owner / Operator names	49%
Regulated Activity	89%

***Which approach(es) would be your preference and why?***

- A. Pre-populated forms printed, mailed out and returned by post***
- B. Web based pre-populated forms printed out by the reporter from the Internet and returned by post***
- C. Web based pre-populated forms edited by the reporter and submitted electronically via the web***

The majority indicated that A was the most preferred, some stated B was preferred, and a few identified C as preferred. In general many respondents pointed out that multiple options would be ideal, both due to the different capabilities of RCRA Sites, as well as the foreseen continuing acceptance of web based mechanisms in the future. Some respondents preferred their current approach, which was typically either via inspections, or via blank forms.

***How much time (on average / per Site) do you anticipate it would take for you to process the verification of this information?***

Of the 29 respondents the average response was 30 minutes per RCRA Site. Many pointed out that the time was highly dependent upon the process used, however, the estimates were generally based on using pre-populated forms, or a state regulation to re-notify.

***Would you anticipate an overall increase or decrease in cost to your agency based on implementing this initiative?***

Of the 24 respondents, 17 anticipate an overall increase, 4 a decrease, and 3 no impact. Those that anticipated a decrease were typically currently performing a similar exercise, and either felt that having better data was already beginning to pay off, or an expansion of the universe they already verify would be easy to accommodate and still not outweigh the advantages.

***If you anticipate that implementing verification would require an increase in resources required to implement the program, how would you anticipate funding the additional resources required?***

Of the 22 respondents, 12 anticipated that they would have to attempt to use current funding or increase their State fees, and 10 anticipated that additional federal funding was the only way they could support the burden involved.

***This is an optional requirement, which may eventually become a regulatory requirement. Do you anticipate implementing this process while it is optional?***

Of the 18 respondents that expressed a clear intention, 11 indicated that they do anticipate implementing it, and 7 indicated that they would not. Of the former, a few indicated that this would be dependent upon federal funding.

***If intend to implement this process, how frequently would you anticipate verifying identification data for the following types of RCRA Sites?***

The average responses were:

TSDs:	every 1.57 years
LQGs:	every 1.73 years
SQGs:	every 2.39 years
Transporters:	every 2.4 years

***Would you anticipate being able to implement a regulation that would require RCRA Sites to verify their data periodically?***

The responses were fairly evenly split here, although a number of respondents that indicated that they could implement a regulation, took the question to mean ‘adopt a federal rule’, not develop an independent State regulation as was intended.

***Is there any regulatory restriction in your State for performing this type of exercise on an optional basis?***

With only a couple of exceptions, all respondents stated that there was no such restriction. The restrictions identified were due to policy and not regulatory restrictions.



## APPENDIX: CASE STUDIES OF STATE VERIFICATION PROCESSES

During the middle of 2000, interviews were conducted with the States of Indiana, Kansas, Michigan, Minnesota and Oregon to understand current verification mechanisms. The table on the following pages summarizes the findings from these interviews.

1	<b>Which universe(s) of RCRA Sites is targeted for verification? How many RCRA Sites are involved and how frequently is verification performed?</b>				
	<p><b>Indiana</b></p> <p>TSDFs annually (~60 sites) LQGs annually (~600 sites) SQGs every 5 years with two iterations to date (~5000 sites)</p>	<p><b>Kansas</b></p> <p>TSDFs as changes occur (60 sites) LQGs as changes occur (250 sites) Kansas SQGs as changes occur (4000 sites)</p>	<p><b>Michigan</b></p> <p>TSDFs ongoing through inspections (240 sites) LQGs one-time April 1999 (2438 sites) SQGs planned (~6500 sites estimated by inspectors, ~9500 listed in RCRIS)</p>	<p><b>Minnesota</b></p> <p>TSDFs ongoing through inspections (30 sites) LQGs (180 sites), SQGs (700 sites), MN very SQGs (3700 sites) annually as part of licensing process.</p>	<p><b>Oregon</b></p> <p>TSDFs ongoing through permits and inspections. Also annually as generators (4 sites) LQGs annually (245 sites) SQGs annually (543 sites) CESQGs annually (2888 sites) Used Oil annually (8 sites) UW Collection annually (3 sites) UW Destination annually (1 site)</p>
2	<b>Please describe the mechanism used to conduct the verification process. For example, use of blank notification-style forms, pre-populated forms, online form availability, or online data submission.</b>				
	<p><b>Indiana</b></p> <p>A two-page form is pre-printed by the State system and mailed to RCRA Sites with spaces provided for corrections. The RCRA Site completes and returns the form.</p> <p>NOTE: Changes to ownership or location must be supported by the submission of an 8700-12 form with an official signature.</p>	<p><b>Kansas</b></p> <p>Updated State Notification forms are required when changes occur.</p> <p>Kansas additionally sends quarterly newsletters to all LQGs and Kansas SQGs. Returned mailings are followed up providing better information.</p>	<p><b>Michigan</b></p> <p>Pre-populated forms are printed from the handler data in RCRIS. The RCRA Site completes and returns the form.</p>	<p><b>Minnesota</b></p> <p>Pre-printed forms are sent to all generators annually requesting verification of generator status for that year. Form includes known basic RCRA Site information and summary waste reporting information from previous report. Generator must provide data on waste production by RCRA waste code and may correct other information on the form before returning to the State. Reported information is used to assess a fee on the generator</p>	<p><b>Oregon</b></p> <p>Pre-populated Registration Verification Report (RVR) produced from State information system and mailed to the sites. For TSDFs, LQGs and SQGs the RVR is sent with the annual waste reporting forms.</p>

<b>3</b>	<b>What set of information is verified? For example, all information included on the notification form or just a subset?</b>				
	<b><i>Indiana</i></b>	<b><i>Kansas</i></b>	<b><i>Michigan</i></b>	<b><i>Minnesota</i></b>	<b><i>Oregon</i></b>
	Name Location address Mailing address Owner Contact SIC codes Activity information	Name Location address Mailing address Owner Contact Land type Activity information Waste codes	Name Location address Contact Generator status	Name Location address Contact Generator status Waste production information by waste code.	Name Location address Mailing address Site phone number Contacts (various) SIC code Employee count Site owner Land owner Generator status
<b>4</b>	<b>What is the primary purpose of the verification process? For example, to improve data quality, to support invoicing.</b>				
	<b><i>Indiana</i></b>	<b><i>Kansas</i></b>	<b><i>Michigan</i></b>	<b><i>Minnesota</i></b>	<b><i>Oregon</i></b>
	To improve data quality resulting in better response to invoicing procedures and to support inspection procedures.	Improve data quality for program management purposes.  An important use is to ensure correct delivery of an annual fee report to LQGs and Kansas SQGs who must report total waste generated and pay a fee based on this generation quantity.	Verification of LQGs was undertaken (1) to obtain an accurate set of information about LQGs to support distribution of the 1999 Biennial Report, and (2) to support the introduction of a fee program proposed for 2002.	To support revenue generation from invoices.	Improve data quality for various program management purposes, including inspection planning and scheduling, rulemaking, technical assistance and supporting annual waste reporting and invoicing procedures.

<b>5</b>	<b>Are the RCRA Sites required by rule or statute to respond, or is response voluntary?</b>				
	<b><i>Indiana</i></b>	<b><i>Kansas</i></b>	<b><i>Michigan</i></b>	<b><i>Minnesota</i></b>	<b><i>Oregon</i></b>
	Not required by rule, currently optional <sup>4</sup> .	Required by rule.	Response is voluntary and the State must clearly indicate this on the form <sup>5</sup> .	Required by State rule.	Required by rule (OAR 340-102-0012) since 1991.
<b>6</b>	<b>What level of response does your State typically experience from each universe?</b>				
	<b><i>Indiana</i></b>	<b><i>Kansas</i></b>	<b><i>Michigan</i></b>	<b><i>Minnesota</i></b>	<b><i>Oregon</i></b>
	TSDFs ~ 90% LQGs ~ 90% SQGs ~ 80%  For TSDFs and LQGs the verification report typically accompanies the annual invoice and since this requires a response, it likely encourages a response to the verification form.	TSDFs – high LQGs – medium Kansas SQGs - low	LQGs 65% immediately, 97% after follow up phone calls.	TSDFs 100% LQGs 100% SQGs 100% MN very SQGs 100%	84% of all RCRA Sites immediately, 98.5% after follow up actions. Eventually will track and probably close the 1.5% outstanding RCRA Sites.

<sup>4</sup> Indiana is currently considering a change to the State regulations to discontinue the collection of manifests by IDEM. This change will be accompanied by a new requirement for all LQG and SQG RCRA Sites to submit an annual waste summary report detailing the information currently collected by the manifest. For LQGs, the reporting requirement will be met by the Biennial Report submission every other year.

This change will effectively result in the mandatory annual verification of basic site information although some data elements, in general, those not found currently on the Uniform Hazardous Waste Manifest will be optional.

<sup>5</sup> Michigan has only performed verification once so far although the State has plans to introduce a fee program that would require annual verification from both LQGs and SQGs in association with fee collection. It has been estimated that implementation of this program will require 4 FTEs. The program will be self-funding in that 20% of revenues will be used to run the program.

The mandatory information collected under the fee program will be minimal although additional optional data elements may also be collected as part of the process and the mandatory set is likely to be broader than the set of information currently collected from LQGs.

<b>7</b>	<b>As far as you can determine, what proportion of responses include changes to the basic site information?</b>				
	<b><i>Indiana</i></b>	<b><i>Kansas</i></b>	<b><i>Michigan</i></b>	<b><i>Minnesota</i></b>	<b><i>Oregon</i></b>
	<p>Approximately 80% of the responses include some change to the notification information.</p> <p>Approximately 30% of these changes involve ownership or location information and are regarded as significant.</p>	<p>No metrics recorded. ~5 Notifications are received per day.</p>	<p>Approximately 81% of responses included changes to the notification information.</p> <p>47% identified changes to RCRA Site name, location, contact.</p> <p>34% of responses included changes to the generator status.</p>		<p>~16% of responses include a change in ownership or generator status and are regarded as significant</p> <p>~5% include a change to mailing address information.</p>
<b>8</b>	<b>If you have performed a verification process more than once for the same universe, please compare the effort required for the initial verification to that required for the subsequent processes</b>				
	<b><i>Indiana</i></b>	<b><i>Kansas</i></b>	<b><i>Michigan</i></b>	<b><i>Minnesota</i></b>	<b><i>Oregon</i></b>
	<p>No metrics are available.</p> <p>For TSDFs and LQGs there was probably little difference since the sites report biennially and are inspected every three years or so.</p> <p>For SQGs the number of changes recorded was probably greater</p>	<p>Wholesale verification not performed.</p>	<p>Only performed one-time.</p>		<p>No specific metrics are available.</p> <p>The process is continually being improved and streamlined to reduce costs.</p>

<b>9</b>	<b>Please provide an estimate of the State resources required to support this verification process. For example, how much staff time is required to produce the verification documentation, follow up with non-responsive sites and record any changes reported?</b>				
	<b>Indiana</b>	<b>Kansas</b>	<b>Michigan</b>	<b>Minnesota</b>	<b>Oregon</b>
	The pre-printed forms are prepared automatically and little follow up is done with non-responsive sites. The major effort involved is in recording the submitted changes. For the LQG universe this amounts to ~10-20% of 1 FTE per year (400 hours). For the SQG universe to ~50% of 1 FTE (1000 hours).	1 FTE per year processing notifications (2000 hours)  1 FTE per year conducting follow-up and troubleshooting (2000 hours).	14 person months were required to verify LQGs including producing and mailing the verification report, following up non-responsive sites and applying changes to RCRIS. It has been estimated that the same exercise for SQGs will likely require 40 to 50 person month effort.  It is estimated that some 10,000 additional sites (CESQGs, used oil handlers, etc) could not be verified in any reasonable timeframe.	4 person months data entry effort for changes.	Approximately 1.3 FTE per year (2700 hours) is committed to mailing of RVRs and follow up.  Approximately 0.7 FTE per year (1300 hours) per year is committed to processing changes into the State information system.
<b>10</b>	<b>If available, please provide estimates of the time required for a "typical" handler to complete the verification form.</b>				
	<b>Indiana</b>	<b>Kansas</b>	<b>Michigan</b>	<b>Minnesota</b>	<b>Oregon</b>
	Minutes	~10 minutes	~10 minutes		~15 minutes
<b>11</b>	<b>How are non-responsive RCRA Sites handled? For example, are follow-up visits conducted?</b>				
	<b>Indiana</b>	<b>Kansas</b>	<b>Michigan</b>	<b>Minnesota</b>	<b>Oregon</b>
	Since the program is optional, no follow-up is conducted.	Site visits or mailings.	Phone calls	Phone calls and rarely a site visit.	Two consecutive letters are mailed to RCRA Sites that don't report by the due date. LQGs and SQGs are then targeted for inspections. Failure to report is recorded as a violation. CEGs are targeted for technical assistance visits.

<b>12</b>	<b>Do you have any measures of the effectiveness of the approach you use in terms of the resulting improvements in data quality? For example, a reduction in the number of unnecessary site visits.</b>				
	<b><i>Indiana</i></b>	<b><i>Kansas</i></b>	<b><i>Michigan</i></b>	<b><i>Minnesota</i></b>	<b><i>Oregon</i></b>
	Assume that improved data quality has reduced wasted costs.	No metrics. Estimated that up to 100 inspections per year are aborted due to incorrect location information about the target site.	Improved data quality ensured correct mailings for the Biennial Report and confirmed information to support inspections.		No specific metrics recorded, however, it is clear that the process reduces wasted mailing costs and the number of unnecessary site visits.
<b>13</b>	<b>What feedback have you received from the regulated community about the verification procedure you use?</b>				
	<b><i>Indiana</i></b>	<b><i>Kansas</i></b>	<b><i>Michigan</i></b>	<b><i>Minnesota</i></b>	<b><i>Oregon</i></b>
	Questions about completion of the forms.	No complaints.	None.		Viewed favorably by the regulated community.
<b>14</b>	<b>How is your RCRA program information managed? If a state-specific system, how does the verified information get provided to the national RCRIS system?</b>				
	<b><i>Indiana</i></b>	<b><i>Kansas</i></b>	<b><i>Michigan</i></b>	<b><i>Minnesota</i></b>	<b><i>Oregon</i></b>
	State-specific system. Also provide data to RCRIS by direct input.	RCRIS by direct input.	RCRIS is used currently by direct input.  State is currently in the process of developing an integrated State system to meet RCRA information management needs.	Have a State-specific database. Also provide data to RCRIS.	State-specific system. Also provide data to RCRIS by translation.

## APPENDIX: EXAMPLE SITE VERIFICATION FORM

An example of a Site Verification form is attached below. This is directly based on the recently finalized Site Identification form, and has been modified to include two subsections for each relevant question on the form. One subsection presents the most recent information known by the Implementer, and the other section is blank to allow the respondent to note any changes they may have to that information.

If you would like to see more information about the new Site Identification form, please review the information that is available at the following web site:

[www.epa.gov/epaoswer/hazwaste/data/brs01/forms.htm](http://www.epa.gov/epaoswer/hazwaste/data/brs01/forms.htm)

Note that the example form below is only intended to provide the reader with some insight into the way this form may be used, and should not be considered a proposed format. Please do not provide comments about the format presented.

For the fields in sections 10a and 10b that have the check boxes with an arrow separating the two are defined as follows: the first box corresponds to the old box with an arrow to the new box (i.e., old box ☐ → ☐ new box).

It is recommended that the instruction booklet (or on-line instructions) that accompanies this form should be shortened to just include directions for each 'box'. The general regulatory explanations and appendices should be separated.

<b>MAIL THE COMPLETED FORM</b>  <b>TO:</b> The Appropriate EPA Regional or State Office.	United States Environmental Protection Agency  <b>RCRA SUBTITLE C SITE IDENTIFICATION VERIFICATION FORM</b>		
<b>1. Reason for Submittal and Status of Information Supplied (see instructions on pages 10 and 11)</b>	<b>A. Reason for Submittal:</b> <input type="checkbox"/> To provide subsequent notification (to update site identification information). <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____). <input checked="" type="checkbox"/> As a component of the Hazardous Waste Report.		
<b>2. Site EPA ID Number (see instructions on page 11)</b>	EPA ID Number: <b>ABD910848737</b>		
<b>3. Site Name (see instructions on page 11)</b>	Legal Name: <b>Refrigerator, Inc.</b>		
<b>Site Name Revised</b>	Legal Name: <i>Cold Stoves, Inc</i>		
<b>4. Site Location Information (see instructions on page 11)</b>	Street Address: <b>200 N. Washington Street</b>		
	City, Town, or Village: <b>RCRA City</b>	State: <b>AB</b>	
	County Name: <b>RCRA County</b>	Zip Code: <b>88899</b>	
<b>Site Location Information Revised</b>	Street Address:		
	City, Town, or Village:	State:	
	County Name:	Zip Code:	
<b>5. Site Land Type</b>	Site Land Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
<b>Site Land Type Revised</b>	Site Land Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input checked="" type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
<b>6. North American Industry Classification System Code(s) for the Site</b>	A. <b>335222</b>	B. <b>332813</b>	
	C. <b>332999</b>	D.	



6. North American Industry Classification System (NAICS) Code(s) Revised	A. 335222		B.
	C.		D.
7. Site Mailing Address (see instructions on page 12)	Street or P. O. Box: <b>200 N. Washington Street</b>		
	City, Town, or Village: <b>RCRA City</b>		
	State: <b>AB</b>		
	Country:		Zip Code: <b>88899</b>
Site Mailing Address Revised	Street or P. O. Box: <b>200 N Washington Street , Suite 160</b>		
	City, Town, or Village:		
	State:		
	Country:		Zip Code:
8. Site Contact Person (see instructions on page 12)	First Name: <b>John</b>	MI: <b>R.</b>	Last Name: <b>Smith</b>
	Phone Number: <b>(999) 684-8000</b>		Phone Number Extension: <b>410</b>
Site Contact Person (see instructions on page 12)	First Name:	MI:	Last Name:
	Phone Number: <b>(999) 684-8130</b>		Phone Number Extension:
9. Legal Owner and Operator of the Site (see instructions on page 12 and 13)	A. Name of Site's Owner: <b>Scott Black</b>		Date Became Owner(mm/dd/yyyy): <b>01/10/1996</b>
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	B. Name of Site's Operator:		Date Became Operator(mm/dd/yyyy):
	Operator Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
Legal Owner and Operator of the Site (see instructions on page 12 and 13)	A. Name of Site's Owner: : <b>Marge White</b>		Date Became Owner (mm/dd/yyyy): <b>11/15/2000</b>
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):
	Operator Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

**10. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. See instructions on pages 13, 14, 15, and 16)**

**A. Hazardous Waste Activities**

**1. Generator of Hazardous Waste**

(choose only one of the following three categories)

- ☐ → ☒ a. LQG: Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or
- ☐ → ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs.) of non-acute hazardous waste; or
- ☐ → ☐ c. CESQG: Less than 100 kg/mo of non-acute hazardous waste

**In addition, indicate other generator activities (check all that apply)**

- ☐ → ☐ d. United States Importer of Hazardous Waste
- ☐ → ☐ e. Mixed Waste (hazardous and radioactive) Generator

**For Items 2 through 6, check all that apply:**

- ☒ → ☐ **2. Transporter of Hazardous Waste**
- ☐ → ☐ **3. Treater, Storer, or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.
- ☐ → ☒ **4. Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity.
- 5. Exempt Boiler and/or Industrial Furnace**
- ☐ → ☐ a. Small Quantity On-site Burner Exemption
- ☐ → ☐ b. Smelting, Melting, Refining Furnace Exemption
- ☐ → ☒ **6. Underground Injection Control**

**B. Universal Waste Activities**

**1. Large Quantity Handler of Universal Waste [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):**

	<u>Generated</u>	<u>Accumulated</u>
a. Batteries	<input type="checkbox"/> → <input type="checkbox"/>	<input type="checkbox"/> → <input type="checkbox"/>
b. Pesticides	<input type="checkbox"/> → <input type="checkbox"/>	<input type="checkbox"/> → <input type="checkbox"/>
c. Thermostats	<input type="checkbox"/> → <input type="checkbox"/>	<input type="checkbox"/> → <input type="checkbox"/>
d. Lamps	<input type="checkbox"/> → <input type="checkbox"/>	<input type="checkbox"/> → <input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/> → <input type="checkbox"/>	<input type="checkbox"/> → <input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/> → <input type="checkbox"/>	<input type="checkbox"/> → <input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/> → <input type="checkbox"/>	<input type="checkbox"/> → <input type="checkbox"/>

☐ → ☐ **2. Destination Facility for Universal Waste**

Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities**

**1. Used Oil Transporter - Indicate Type(s) of Activity(ies)**

- ☐ → ☐ a. Transporter
- ☐ → ☐ b. Transfer Facility

**2. Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)**

- ☐ → ☐ a. Processor
- ☐ → ☐ b. Re-refiner

☐ → ☐ **3. Off-Specification Used Oil Burner**

**4. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)**

- ☐ → ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ → ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications